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September 16, 1996

**VIA HAND DELIVERY**

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SEP 16 1996

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

Re: Reply Comments of Iowa Network Services, Inc. In  
the Matter of Telephone Number Portability  
CC Docket No. 96-116 RM 8535

95-116

Dear Mr. Caton:

On behalf of Iowa Network Services, Inc., there is transmitted herewith an original and sixteen (16) copies of its reply comments in response to the Commission's Further Notice of Proposed Rule Making, in the referenced docket released July 2, 1996.

Sufficient copies are being filed so that each Commissioner may receive an individual copy.

Please direct any questions regarding this filing to the undersigned.

Sincerely yours,

  
James U. Troup  
Brian D. Robinson

Enclosures

cc: Competitive Pricing Division, CCB (by hand)  
International Transcription Service (by hand)

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of

Telephone Number Portability

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CC Docket No. 95-116  
RM 8535

REPLY COMMENTS OF  
IOWA NETWORK SERVICES, INC.

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September 16, 1996

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**SUMMARY**

Iowa Network Services, Inc. ("INS") submits these reply comments regarding cost allocation and recovery for costs associated with long-term telephone number portability. Its reply comments make the following points: (1) the Commission should adopt long-term number portability cost recovery rules that ensure that all carriers bear the common costs related to its implementation; (2) incumbent carriers operating in rural areas should not be forced to make a contribution to the recovery of common costs until carriers and end-users in those areas obtain the benefits of number portability; and (3) carrier specific number portability costs should be recovered directly from the carriers that receive ported numbers.

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telephone Number Portability	)	CC Docket No. 95-116
	)	RM 8535
	)	

**REPLY COMMENTS OF  
IOWA NETWORK SERVICES, INC.**

To: The Commission

Iowa Network Services, Inc. ("INS") hereby files its reply comments in the above-captioned proceeding regarding cost allocation and recovery of telephone number portability costs.<sup>1</sup>

**I. Introduction**

INS is one of several providers of centralized equal access (CEA) in the U.S. today. It is owned by and provides service to 136 independent rural local exchange carriers ("LECs") operating 293 local exchanges and approximately 182,000 access lines in rural Iowa. INS' CEA services have allowed its participating LECs to make equal access and advanced network services available in rural areas where it would not otherwise have been feasible to do so. By providing the equal access function at the central tandem, the prohibitive cost of installing equal access technology in each LEC's end office was avoided. In addition, the aggregated traffic of multiple networks created a pool of subscribers large enough to attract competitive long distance carriers.

INS plans to provide long-term local telephone number portability as a natural outgrowth of its provision of CEA service.

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<sup>1</sup> In the Matter of Telephone Number Portability, Further Notice of Proposed Rule Making, CC Docket No. 95-116, FCC 96-286 (released July 2, 1996) ("Further Notice").

By using centralized facilities for the provision of local telephone number portability, INS will reduce costs for its participating LECs making it possible for their end-users and competitive LECs to benefit from the new competitive environment that may be fostered by the availability of number portability.

The costs of implementing and providing long-term number portability are likely to be considerable. Consequently, the means by which INS and its participating LECs recover these costs are critical as the industry transitions to a competitive environment. INS participates in the reply comment cycle of this proceeding to address the initial comments and to ensure that the Commission's implementing regulations fairly allocate costs among all carriers and at the same time do not unfairly saddle rural carriers with the costs of implementing number portability before local demand materializes. Bearing in mind that INS and other existing facilities-based carriers will incur most of the cost of implementing long-term number portability if and when demand materializes, the Commission's regulations must not compromise these carrier's ability to recover a fair portion of their costs of implementing and providing long-term number portability from the entities causing and benefiting from that investment.

## II. Discussion

### A. All Carriers Must Bear The Costs of Long Term Number Portability

Section 251(e)(2) of the Communications Act states that "the costs of establishing . . . number portability shall be borne by all telecommunications carriers on a competitively neutral basis as determined by the Commission."<sup>2</sup> Consistent with the mandate of Section 251(e)(2), the Commission has no authority to exclude any groups of telecommunications carriers from the cost recovery mechanisms established for number portability and, therefore, must adopt a method of cost allocation that assigns the shared costs of long-term number portability to all telecommunications carriers including competitive LECs, IXC's, commercial mobile radio service (CMRS) providers and other carriers benefiting from number portability. Moreover, the requirement that number portability costs must be born on a competitive neutral basis requires that all carriers share in the costs of this undertaking.

In the Further Notice at para. 208, the Commission tentatively concludes that the following three types of costs are involved in providing long-term number portability:

- Type 1 Costs- those incurred by the industry as a whole, such as costs incurred by the database administrator to build and administer the databases needed to provide number portability;
- Type 2 Costs- carrier-specific costs directly related to providing number portability (e.g., the costs to

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<sup>2</sup> 47 U.S.C. § 251(e)(2).

purchase the switch software implementing number portability); and

Type 3 Costs- carrier-specific costs not directly related to number portability (e.g., upgrades to or implementation of SS7 and AIN).

INS supports the Commission's tentative conclusions concerning the three general categories of long term number portability costs identified in the Further Notice with one important clarification. INS agrees with the commenters such as the United States Telephone Association (USTA) and Ameritech that assert that certain costs considered by the Commission to be Type 3 costs (e.g., SS7 or AIN upgrades) should be classified as Type 2 costs if they are incurred for the sole purpose of providing long-term number portability.<sup>3</sup>

As discussed in Comments filed by The National Telephone Cooperative Association (NTCA) and the Organization For the Promotion and Advancement of Small Telecommunications Companies (OPASTCO), many rural carriers have not experienced sufficient demand to require implementation of SS7 or AIN technologies and have no immediate plans to undertake such upgrades.<sup>4</sup> If such carriers are required to invest in SS7, AIN or other network upgrades only to comply with requests for number portability, these upgrades should be considered Type 2 Costs, i.e., directly related to implementation of number portability and, as discussed in more

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<sup>3</sup>Comments of USTA, pp. 2-3; Comments of Ameritech, p. 3.

<sup>4</sup>Comments of USTA and OPASTCO, p. 6.



detail below, recoverable from carriers receiving number portability service.

INS supports the Commission's tentative conclusion at para 213 that Type 1 shared facilities costs should be allocated in proportion to each telecommunications carrier's total gross telecommunications revenues net of charges paid to other carriers. This allocation of costs is consistent with Section 251 requirements that costs be borne by carriers on a competitively neutral basis. Furthermore, such allocations should be made on a regional basis limited to the established regional database facilities. A regional approach is most equitable because the costs of establishing and administering each regional database will likely vary, for example, with demographic characteristics of that region.

**B. Rural Carriers Such As INS Should Not Be Forced To Bear Shared (Type 1) Costs of Long-Term Number Portability Until They Are Requested To Provide It.**

The Further Notice at para. 212 sought comment on which carriers should bear the costs of the provision of long-term number portability. Facilities-based carriers should not be required to bear the costs of number portability until number portability is requested. INS plans to provide long-term number portability in accordance with the Commission's Rules and upon a bona fide request

from another telecommunications carrier.<sup>5</sup> However, it may be several years until INS and its participating LECs must provide long-term number portability.<sup>6</sup> It is unreasonable to expect INS and its participating LECs to pay for shared number portability costs while their customers do not receive the benefits of number portability.

In the Further Notice at para. 216, the Commission also sought comment on its tentative conclusion concerning the following subcategories of Type 1 or shared number portability costs:

- Type 1(a) Costs- non-recurring costs, including the development and implementation of the hardware and software for the database;
- Type 1(b) Costs- recurring costs for maintenance and operation of the database; and
- Type 1(c) Costs- costs for uploading, downloading, and querying the database.

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<sup>5</sup>Of course, a bona fide request must provide INS and other carriers with reasonable assurance of the legitimacy of the carrier's need for long-term number portability. At a minimum, the request should: (1) request service for a minimum one year service period. See Implementation of the Local Competition Provisions in the Telecommunications Act of 1996, First Report and Order, CC Docket 96-98, FCC 96-325, at para. 1257 (released August 8, 1996); (2) identify the discrete geographic area covered by the request; and (3) provide a tentative date six months or more in the future when the requesting carrier will begin to receive number portability. See In the Matter of Telephone Number Portability, First Report and Order, CC Docket No. 95-116, FCC 96-286, at para. 80 (released July 2, 1996) ("First Report and Order").

<sup>6</sup>Pursuant to Section 52.3(c) of the Commission's Rules, Beginning January 1, 1999, LECs outside of the top 100 MSAs must make long-term number portability within six months after receiving a bona fide request.

INS believes that these subcategories represent a reasonable breakdown of shared costs and submits that carriers should not bear these costs until the carrier receives a bona fide number portability request. Because the Commission has adopted a phased implementation approach to long-term number portability, it makes sense that contributions by carriers responsible for implementation (e.g., LECs and incumbent LECs) should only occur in a similarly phased fashion.

INS believes that phasing in a carrier's allocated share of Type 1 costs should be relatively simple to administer. As carriers implement number portability, the contribution to cover their allocated share of non-recurring and recurring shared costs (Type 1(a) and 1(b)) could be collected and applied as a credit to those carriers that have already contributed to the establishment of the database. Usage sensitive costs, e.g., costs of accessing the database (Type 1(c)) should be recovered directly by the database administrator through direct charges to the carriers accessing the database.

**C. Carrier Specific (Type 2) Long-Term Number Portability Costs Should Be Recovered From Carriers Benefiting From Number Portability.**

Incumbent LECs and other facilities-based LECs required to implement local number portability are likely to incur the lion share of the costs of implementing number portability. Moreover, the direct result of this investment will reduce these carriers' customer base through the introduction of local competition. If

the LEC's disproportionate share of these costs can only be recovered from LEC end-users, local rates may increase particularly if LECs are forced to spread their number portability costs over an ever-shrinking customer base. Increasing rates for incumbents places them at a disadvantage when they are faced with price competition by largely unregulated competitive LECs.

Therefore, any cost recovery mechanism adopted by the Commission must permit facilities-based carriers such as INS and its participating LECs to recover their costs from those carriers that receive ported numbers. These are the customers that benefit from the implementation of number portability. Such a mechanism will ensure that "all telecommunications carriers" bear the costs of number portability consistent with Congress' intention as expressed in the plain language of Section 251(e)(2).

Carriers that obtain local number portability from INS and its participating LECs get the immediate and obvious benefit of enticing customers to switch to that carrier while retaining existing telephone numbers. INS and its participating carriers' specific investment to port end-user numbers is directly related to that benefit. In the Further Notice at para. 222, the Commission sought comment on whether it should mandate a mechanism by which incumbent LECs or other carriers may recover carrier specific costs. INS and its participating LECs should be permitted to recover such costs through a charge to all carriers receiving ported numbers using INS or a LEC's network on a per-query or other

usage sensitive basis. This cost recovery mechanism is competitively neutral because as numbers are ported to INS and its participating LECs, they also will be charged for number portability.

Recovery of carrier specific costs from the cost causer eliminates consumer concerns that are created by the assessment of an end user surcharge to all local subscribers. The suggested recovery mechanism also addresses the concerns of incumbent LECs that, in order to pay for mandated upgrades, could be forced to increase local service rates. Congress was no doubt aware of these concerns when it required only "telecommunications carriers" to bear number portability costs.

In addition, the recovery mechanism recommended by INS recovers costs of implementing what amounts to equal access for local calls. Consistent with how the Commission permitted the recovery of costs for equal access for long distance calls, the Commission should allow the recovery of long-term number portability costs from the carriers that are benefiting from the new service, i.e., those carriers, whether incumbents or new entrants, receiving ported numbers.

Finally, by allowing carriers to recover their own costs of implementing number portability the Commission avoids the expensive and administratively burdensome task of collecting industry cost information, allocating carrier specific costs to a cost pool, collecting the contributions of those carriers responsible for

those costs and then remitting them to carriers incurring costs. Moreover, such pooling arrangements require an unwarranted and costly bureaucracy and may encourage unnecessary and inefficient investment.

**V. Conclusion**

The Commission should adopt number portability cost recovery rules that ensure that all carriers bear the common costs related to its implementation. Incumbent carriers operating in rural areas should not be forced to make a contribution to the recovery of common costs until carriers and end-users in those areas obtain the benefits of number portability. Finally, carrier specific number portability costs should be recoverable directly from the carriers that receive ported numbers or that otherwise gain the benefit from implementation of number portability. INS respectfully requests that the Commission adopt regulations consistent with the proposals described above.

Respectfully submitted,

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September 16, 1996

# **CERTIFICATE OF SERVICE**

I, Kathleen O'Keefe, this 16th day of September, 1996, hereby certify that I served a copy of the foregoing REPLY COMMENTS OF IOWA NETWORK SERVICES, INC. by first class, U.S. mail, postage prepaid, upon the following persons:

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